

# Exhibit B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

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No. 2:12-md-02323-AB

MDL No. 2323

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Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*  
Plaintiffs,

**Hon. Anita B. Brody**

v.

CIVIL ACTION NO: 14-00029-AB

National Football League and  
NFL Properties, LLC,  
successor-in-interest to  
NFL Properties, Inc.,  
Defendants.

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THIS DOCUMENT RELATES TO:  
ALL ACTIONS

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**DECLARATION OF MATTHEW L. GARRETSON**

I, Matthew L. Garretson, hereby declare as follows:

1. I am an adult over twenty-one years of age and am competent to testify to all matters contained herein. I am the Founder and Chief Executive Officer of The Garretson Resolution Group, Inc. ("GRG") and an attorney licensed to practice law in the State of Ohio. I have personal knowledge of the facts set forth herein and if called and sworn as a witness, I could and would testify competently thereto.

2. GRG serves as the BAP Administrator for the Settlement program in the above-captioned action.<sup>1</sup> Since its appointment to serve in this role, GRG has worked diligently with

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Settlement Agreement.

the Parties to discharge its responsibilities under the Settlement Agreement. I submit this declaration to provide an update to the Court on the status of GRG's work.

**BASELINE ASSESSMENT PROGRAM**

3. As the BAP Administrator, GRG is responsible for establishing and maintaining a network of Qualified BAP Providers to provide the specified baseline assessment examinations under the BAP and authorized medical services under the BAP Supplemental Benefits. (ECF No. 6481-1, Settlement Agreement § 5.7(a)(i).) Since the BAP commenced on June 6, 2017, GRG has made significant progress in creating a robust, nationwide provider network.

4. In order to plan for appropriate coverage, GRG analyzed preliminary ZIP-code-level data provided by the Claims Administrator to estimate the relative distribution of Retired NFL Football Players across the country. This analysis showed that by targeting its efforts toward fifty-three cities (comprising the fifty largest metropolitan statistical areas in the United States, plus Anchorage, Alaska; Honolulu, Hawaii; and Green Bay, Wisconsin), GRG would be able to effect coverage of seventy-eight percent of potential Settlement Class Members within fifty miles of one of the fifty-three target cities, eighty-five percent within 100 miles, and ninety-seven percent within 200 miles. This analysis also has enabled GRG to estimate the relative number of Qualified BAP Providers needed in each city.

5. GRG has identified key provider organizations with board-certified neurologists and ABPP- and ABCN-certified clinical neuropsychologists to serve as Qualified BAP Providers in each of the fifty-three target cities. GRG also has identified additional Qualified BAP Provider candidates outside the key provider organizations in order to ensure adequate network capacity for the forecasted level of participation in the BAP. As of November 1, 2017, GRG had secured applications for participation in the BAP from 550 board-certified neurologists and ABPP- or ABCN-certified clinical neuropsychologists, including clinical neuropsychologists in

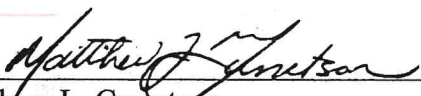
all fifty-three target cities and neurologists in fifty-two of fifty-three target cities (GRG is still pursuing a neurologist for participation in Anchorage, Alaska). Furthermore, as of November 1, 2017, GRG had engaged in contract negotiations with 464 potential Qualified BAP Providers and had contracted with 290 Qualified BAP Providers, including 161 clinical neuropsychologists in 50 of the 53 target cities in or near where the majority of the living Retired NFL Football Players reside, and 129 neurologists in 45 of the 53 target cities in or near where the majority of the living Retired NFL Football Players reside. GRG is continuing its efforts to enroll Qualified BAP Providers in the remaining target cities and to expand the network of Qualified BAP Providers wherever necessary to ensure sufficient depth of coverage.

6. GRG also has made significant progress in scheduling Retired NFL Football Players for baseline assessment examinations. As of November 1, 2017, GRG had scheduled 3,584 baseline assessment examination appointments on behalf of 2,136 Retired NFL Football Players. (Each baseline assessment examination consists of two appointments — one neurology appointment and one clinical neuropsychology appointment.)

THE DECLARANT SAYS NOTHING FURTHER.

I, Matthew L. Garretson, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on this 3rd day of November, 2017.

  
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Matthew L. Garretson